

EDMUND G. BROWN JR.
GOVERNORMATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION**Los Angeles Regional Water Quality Control Board**

August 8, 2014

Mr. Eric Lardiere
General Counsel
Whittaker Corporation
1955 North Surveyor Avenue
Simi Valley, California 93063

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7008 1830 0004 3359 1305

Mr. Morton M. Kay
President
Gleason Industrial Products, Inc.
10474 Santa Monica Blvd., Suite 400
Los Angeles, CA 90025

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7008 1830 0004 3359 1299

SUBJECT: REQUIREMENT FOR TECHNICAL REPORT PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2014-0132

SITE: FORMER TECHNIBILT CORPORATION, WHITTAKER CORPORATION; GLEASON INDUSTRIAL PRODUCTS, INC., GLEASON CORPORATION, 3075 NORTH CALIFORNIA STREET, BURBANK, CALIFORNIA (FILE NO. 104.0737)

Dear Messrs. Lardiere and Kay:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of the Los Angeles and Ventura counties, including the referenced site.

The Regional Board is investigating potential sources for groundwater contamination within the United States Environmental Protection Agency (USEPA) San Fernando Valley Superfund Site (Superfund Site). It is known that groundwater within the Superfund Site, including the vicinity of the former Technibilt Corporation (Technibilt) facility, is contaminated with volatile organic compounds (VOCs) and heavy metals, particularly chromium.

Regional Board staff has reviewed technical information and historical documents contained in Regional Board files for the subject property located at 3075 North California Street, in the City of Burbank, California (Site). Regional Board records indicate that the Site was occupied by Kromseal Corporation between 1957 and 1960 (which was merged into Technibilt in 1978), and was occupied by Technibilt, a division of Whittar Industries, Limited (a subsidiary of Whittaker Corporation) between 1977 and 1983. Based on our review, we have determined that additional information is required regarding the

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

Mr. Erick Lardiere
Mr. Morton M. Kay
Former Technibilt Corporation

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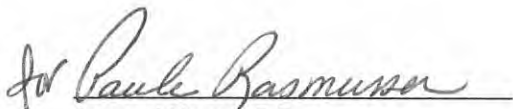
operations conducted and chemicals used and stored during Technibilt's operations, due to the metal finishing operations once conducted by Technibilt and its merged business entities at the Site.

Enclosed is a California Water Code section 13267 Order (Order) requiring you to complete and return the attached Chemical Storage and Use Questionnaire form that describes past and present operations, chemical storage and chemical usage information for the Site. You are also required to disclose information regarding this facility and submit all documentation regarding chemical use and storage. This includes hazardous waste manifests, chemical inventory, fire department inspections and any other relevant documents, in order to evaluate the Site for the potential for soil and groundwater contamination from Technibilt's past operations.

Regional Board records indicate that the operations outlined in the attached order occurred under the merged business entities of Gleason Corporation (alias Gleason Industrial Products Incorporated) and Whittaker Corporation. Therefore, both entities named herein, are required to comply with the Order.

Should you have any questions related to this matter, please contact Ms. Jillian Ly at (213) 576-6731 or jillian.ly@waterboards.ca.gov.

Sincerely,



Samuel Unger, P.E.
Executive Officer

Enclosure: California Water Code Section 13267 Order No. R4-2014-0132
Chemical Storage and Use Questionnaire

cc: Ms. Lisa Hanusiak, USEPA Region IX
Mr. Leo Chan, City of Glendale
Mr. Bill Mace, City of Burbank Water Supply Department
Mr. Vahe Dabbaghian, Los Angeles Department of Water & Power
Mr. Albert Gastelum, Los Angeles Department of Water & Power
Mr. Jonathan Leung, Los Angeles Department of Water & Power
Mr. Richard Slade, ULARA Watermaster

Los Angeles Regional Water Quality Control Board

**ORDER TO PROVIDE A TECHNICAL REPORT
CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2014-0132**

DIRECTED TO WHITTAKER CORPORATION AND GLEASON CORPORATION (ALIAS GLEASON INDUSTRIAL PRODUCTS, INCORPORATED)

**WHITTAKER CORPORATION AND GLEASON INDUSTRIAL PRODUCTS, INCORPORATED
(FORMER TECHNIBILT CORPORATION)
3075 NORTH CALIFORNIA STREET, BURBANK, CALIFORNIA
(FILE NO. 104.0737)**

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) makes the following findings and issues this Order pursuant to California Water Code (CWC) section 13267, which authorizes the Regional Board to require the submittal of technical and monitoring reports.

1. The groundwater within the San Fernando Valley Groundwater Basin (Basin) has been impacted by discharges of heavy metals, specifically chromium. The San Fernando Valley Superfund Site (Superfund Site) lies within the Basin. The United States Environmental Protection Agency (USEPA) and the Regional Board are investigating the potential sources of the discharges to the Basin. The agencies are currently focused on identifying individuals and companies responsible for the discharges of chromium in the Basin and holding them responsible for the investigation and remediation of the source sites. The property located at 3075 North California Street, in the City of Burbank, California (Site) is a potential source of chromium and overlies the Basin.
2. The Site is currently owned by the De Roo Trust and is occupied by Mid Valley Anodizing. Mid Valley Anodizing has operated at the Site since 1986 and specializes in anodizing aluminum components. Regional Board files indicate that Gleason Corporation (alias Gleason Industrial Products, Incorporated) occupied the Site between 1983 and 1984; Technibilt Corporation (Technibilt) occupied the Site between 1977 and 1983; and Kromseal Corporation (Kromseal) occupied the Site between 1957 and 1960. Technibilt was a majority owned subsidiary of Gleason Corporation from approximately 1970 until 1978 when Technibilt merged into Gleason Corporation. Additionally, in 1978, Kromseal was merged into Technibilt prior to Technibilt being merged into Gleason Corporation. Technibilt continued to operate as a division of Gleason Corporation until December 31, 1981, when it was sold to Whittar Industries, a subsidiary of Whittaker Corporation (Whittaker). Technibilt conducted metal finishing operations that included: manufacturing of shopping carts, electroplating, parts finishing, assembly, and warehousing.

A heavy metals investigation was conducted in May and August 2005 that included the collection and analysis of soil samples from the existing process area of Mid Valley Anodizing. The investigation only focused on the process area of Mid Valley Anodizing. The soil sample

results reported concentrations of nickel, chromium and hexavalent chromium at maximum concentrations of 390 milligrams per kilogram (mg/kg), 66 mg/kg and 25.20 mg/kg, respectively. A No Further Requirement letter was issued in November 2005 based on the available information and soil screening levels at that time. However, based on Regional Board's current review of the file, the hexavalent chromium concentrations detected in the subsurface soil during the 2005 investigation, and recent information that indicate that Technibilt operated at the Site prior to Mid Valley Anodizing's operations; the potential discharge and/or release of heavy metal compounds to the soils at the Site (particularly outside of the process area of Mid Valley Anodizing), as a result of past metal finishing operations conducted by Technibilt have not been fully determined.

3. Regional Board has evidence in case file indicating that there is or has been a discharge of waste at or from the Site. The evidence supporting this requirement is that the 2005 heavy metals investigation indicates a discharge of chromium had occurred as stated in paragraph 2. The former Technibilt facility, located within the USEPA San Fernando Valley Superfund Site (Superfund Site), specialized in metal fabrication/finishing and manufacturing of shopping carts at the Site. It is known that groundwater within the Superfund Site, including the vicinity of the former Technibilt facility, is contaminated with volatile organic compounds and heavy metals, particularly chromium. The amount of chemicals used and stored for the metal finishing operations by Technibilt has not been disclosed to the Regional Board. The heavy metals soil investigation conducted in 2005 was focused only in the process area of Mid Valley Anodizing's operations. Other potential areas of concern as a result of Technibilt's operations at the Site have not been investigated and to date, no subsurface heavy metals soil or groundwater investigation has been performed to investigate the operations of Technibilt at the Site.

4. CWC section 13267(b)(1) states:

"In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

5. This Order identifies the Whittaker Corporation and Gleason Corporation (alias Gleason Industrial Products, Incorporated) as the entities responsible for the potential unauthorized discharge of waste identified in paragraph two (2) and three (3) because Gleason Corporation was the former entity who owned and operated and Whittaker Corporation was the subsequent entity who operated the activity at the Site that resulted in the potential discharge of waste.

6. This Order requires the persons/entities named herein to prepare and submit the enclosed Chemical Storage and Use Questionnaire (CUQ) as well as technical reports on the operations history and chemical use history at the former Technibilt facility. You are expected to submit a complete report or reports, as required by this Order, to the Regional Board. The Regional Board may request additional information under the issuance of this Order.
7. The Regional Board needs this information in order to completely evaluate the former Technibilt facility and to determine the subsurface soil conditions at the Site as part of the effort to identify sources of chromium contamination in the Basin.
8. The burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The information is necessary to identify sources of discharges of waste to the Basin and to assure adequate cleanup of the facility, which as described above potentially poses significant threats to public health and the environment.
9. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to section 15321(a)(2), Chapter 3, Title 14 of the California Code of Regulations. This Order requires submittal of technical and/or monitoring reports and work plans. The proposed activities under the work plan are not yet known. It is unlikely that implementation of the work associated with this Order could result in anything more than minor physical changes to the environment. If the implementation may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to implementing any work plan.
10. Any person aggrieved by this action of the Regional Board may petition the State Water Resources Control Board (State Board) to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at the following link:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality

or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED that Whittaker Corporation and Gleason Corporation (alias Gleason Industrial Products, Incorporated), pursuant to section 13267(b) of the CWC, is required to submit the following:

1. By **September 26, 2014**, complete and return the attached CUQ which provides information on past and/or present chemicals stored and used at the former Technibilt facility, located at 3075

North California Street in the City of Burbank, California. Please, return this questionnaire, properly signed, even if no chemicals are stored or used at your facility.

2. You must submit any and all documentation regarding the historical chemical use and storage and detailed information on historical metal finishing processes conducted at the former Technibilt facility, including copies of hazardous waste manifests, chemical inventory lists, fire department inspection records, and other relevant documents.
3. You must also submit a formal response to this Order regarding the past operations and ownership history at the Site. The response shall include detailed information of former and existing chromium storage, hazardous waste management, and associated practices and detail information on the operational history of Kromseal and Technibilt at the Site.

The above items shall be submitted to:

Ms. Jillian Ly, P.E.
Water Resources Control Engineer
Remediation Section
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, California 90013
Phone: (213) 576-6731
Email: jillian.ly@waterboards.ca.gov

Pursuant to 13267(a) of the CWC, any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to section 13268(b)(1) of the CWC, failure to submit the required information described above by the specified due date(s) may result in the imposition of administrative civil liability by the Regional Board in an amount up to one thousand dollars (\$1,000) per day for each day the information is not received after the above due date. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

The Regional Board, under the authority given by the CWC section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports submitted under the 13267 Order. The perjury statement shall be signed by a senior authorized Whittaker Corporation and Gleason Industrial Products, Incorporated (not by a consultant) representative. The perjury statement shall be in the following format:

"I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Mr. Eric Lardiere
Mr. Morton M. Kay
Former Technibilt Corporation

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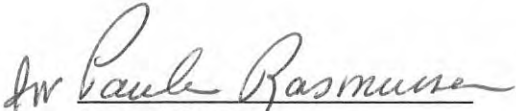
August 8, 2014

The State Board adopted regulations (Chapter 30, Division 3 of Title 23 & Division 3 of Title 27, California Code of Regulation) requiring the electronic submittal of information (ESI) for all site cleanup programs, starting January 1, 2005. Currently, all of the information on electronic submittals and GeoTracker contacts can be found on the Internet at the following link:

http://www.waterboards.ca.gov/ust/electronic_submittal.

To comply with the above referenced regulation, you are required to upload all technical reports, documents, and well data to GeoTracker by the due dates specified in the Regional Board letters and orders issued to you or for the Site. However, the Regional Board may request that you submit hard copies of selected documents and data in addition to electronic submittal of information to GeoTracker.

SO ORDERED.


Samuel Unger, P.E.
Executive Officer

August 8, 2014
Date

Los Angeles Regional Water Quality Control Board

CHEMICAL STORAGE AND USE QUESTIONNAIRE
HEAVY METALS INVESTIGATION
FORMER TECHNIBILT
3075 NORTH CALIFORNIA STREET, BURBANK, CALIFORNIA

I. Facility information

1. Company name: _____
2. Company address: _____ Unit No. _____
3. Contact Name: _____ Email: _____
4. City: _____ Zip code: _____ Phone: () _____
5. Standard Industrial Classification (SIC): _____
6. Brief description of business:

7. EPA Generator I.D. Number: _____ Years at this location: _____

8. Answer the following questions relative to **present** operations:

- A. Do you perform plating, metal finishing, and anodizing? _____ Yes _____ No
If yes, please explain:

- B. Do you have plating or anodizing tanks? _____ Yes _____ No

- C. Do you use or have you ever used Aluminicote type products? _____ Yes _____ No

- D. Do you have a clarifier, sump, tank or other holding tanks for wastewater? _____ Yes _____ No

- E. Do you have an industrial waste permit for sewer discharge? _____ Yes _____ No
If yes, provide permit no. _____

- F. Do you store chemicals at this location? _____ Yes _____ No

G. Have any soil, wastewater and/or groundwater investigations been conducted on the property?

____ Yes ____ No

If so, provided date(s), and State or local agency?

9. Do you know if plating operations existed at this location?

____ Yes ____ No

If yes, please explain:

10. Answer the following questions relative to **past** operations, if applicable:

A. Address of previous metal finishing operations: _____

B. Years in business at previous location(s), if applicable: _____

C. Did you once have plating or anodizing tanks? ____ Yes ____ No

D. Did you perform any metal finishing work? ____ Yes ____ No

E. Did you have a clarifier, sump, tank or other holding tanks for waste water? ____ Yes ____ No

F. Did you have an industrial waste permit for sewer discharge? ____ Yes ____ No

G. Did you have a drum storage area? ____ Yes ____ No

H. Have any soil, waste water and/or groundwater investigations been conducted on the property? ____ Yes ____ No

If so, provide date(s) and name of regulatory agency: _____

11. Name(s) of former tenants(s), dates of operation and type of business (provide a separate sheet if necessary).

Company Name	Type of Business	Dates of Operation at the Site

12. List all processes in which metallic compounds (Chromium, Cadmium, Mercury, Nickel, Zinc, etc.) are used.

II. Property owner information

1. Name of current property owner: _____
2. Mailing address of property owner: _____
3. City: _____ Zip code: _____ Phone: () _____
4. Prior property owner(s) and the dates of their ownership (for past 40 yrs., if known)

Property Owner	Dates of Ownership	
	From	To

III. Waste Management

1. List source(s) of industrial waste(s) from the site? (Identify sources by process, composition of wastes generated and approximate quantity disposed of monthly).

IV. Sewer Information

1. _____ Industrial _____ Septic tank _____ Municipal _____ Cesspool _____ Other
2. Was a different disposal system used in the past? _____ Yes _____ No
- If yes, specify type _____

V. Chemical Storage and Use

Complete the following sections for each chemical(s) used or stored at the facility, both past and present use; excluding common housekeeping chemicals. Add separate sheets to complete your listing, if necessary.

Chemical Name: _____

1. Common/Trade name: _____ Quantity stored: _____
2. Storage method: _____ Underground tank _____ Drums
 _____ Aboveground tank _____ Other (specify): _____
3. Waste disposal: _____ Sewered _____ Onsite recycling
 _____ Hauled _____ Offsite recycling
4. Is waste treatment preformed prior to disposal? _____ Yes _____ No
If yes, specify treatment method: _____
5. Is waste stored prior to disposal? _____ Yes _____ No
6. Are manifest records for designated waste streams available for review? _____ Yes _____ No

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4. Is waste treatment preformed prior to disposal? _____ Yes _____ No
 If yes, specify treatment method: _____
5. Is waste stored prior to disposal? _____ Yes _____ No
6. Are manifest records for designated waste streams available for review? _____ Yes _____ No

THIS QUESTIONNAIRE SHALL BE SIGNED AND ACKNOWLEDGE BELOW AS FOLLOWS:

By a principal, an executive of the company, or other authorized representative of the company.
This questionnaire has been completed under penalty of perjury and to the best of my knowledge, as true and correct.

Signature: _____

Date: _____

Printed name: _____

Title: _____

Phone number: () _____

Please Return this Form to:

**LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD
320 WEST 4TH STREET, SUITE 200
LOS ANGELES, CALIFORNIA 90013**